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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

FILED

2008 AUG 18 AM 10:42

UNITED STATES OF AMERICA,

Plaintiff,

v.

Jon Ralph DIBBLE
(AKA: Jon Ralph Lara DIBBLE)

Defendant.

'08 MJ2537

Magistrate Case No. _____

COMPLAINT FOR VIOLATION OF

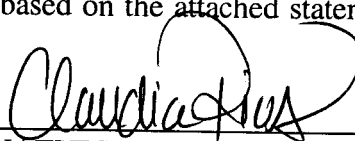
Title 8, U.S.C., Section
1324(a)(2)(B)(iii)-
Bringing in Illegal Alien(s)
Without Presentation

CLERK US DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
BY YANK DEPUTY

The undersigned complainant being duly sworn states:

On or about **August 15, 2008**, within the Southern District of California, defendant, **Jon Ralph DIBBLE (AKA: Jon Ralph Lara DIBBLE)** with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that aliens, namely, **Maria Guadalupe GARCIA-Tolento and L.G.G.T.**, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said aliens, and upon arrival did not bring and present said aliens immediately to an appropriate immigration officer at a designated port of entry; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(iii).

And the complainant states that this complaint is based on the attached statement of facts, which is incorporated herein by reference.



SIGNATURE OF COMPLAINANT

Claudia Rios, U.S. Customs and Border
Protection Enforcement Officer

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS **18TH** DAY OF
AUGUST, 2008.



UNITED STATES MAGISTRATE JUDGE

20A
7/15/08
KNA

PROBABLE CAUSE STATEMENT

I, United States Customs and Border Protection (CBP) Enforcement Officer Eric M. Velazquez, declare under penalty of perjury the following to be true and correct:

The complainant states that **Maria Guadalupe GARCIA-Tolento and L.G.G.T** are citizens of a country other than the United States; that said aliens have admitted they are deportable; that their testimony is material, that it is impracticable to secure their attendance at the trial thereof by subpoena; and they are material witnesses in relation to this criminal charge and should be held or admitted to bail as prescribed in Title 18, United States Code, Section 3144.

On August 15, 2008 at about 2236 hours, Jon Ralph DIBBLE (AKA: Jon Ralph Lara DIBBLE) (Defendant) applied for entry into the United States from Mexico through the Tecate Port of Entry. Defendant was the driver and sole visible occupant of a 2000 Dodge Intrepid. Defendant gave a negative Customs declaration to a Customs and Border Protection (CBP) Officer. Defendant stated he was visiting immediate relatives in Tecate, Mexico and added he was going home to Chula Vista, California. Defendant claimed he was the owner of the vehicle. The CBP Officer noticed Defendant appeared to be anxious in leaving and his answers also appeared to be evasive. The CBP Officer requested the vehicle's registration and Defendant presented a State of Minnesota vehicle title. The CBP Officer suspected the document was altered and elected to refer Defendant and the vehicle to secondary for further inspection.

In secondary, a CBP Canine Enforcement Officer screened the vehicle with his assigned service canine. The service canine alerted to the trunk area of the vehicle. Defendant was handcuffed and escorted to the security office. CBP Officers opened the trunk and noticed a piece of black cloth inside the spare tire well. CBP Officers lifted the spare tire cover, removed the piece of black cloth and discovered an adult Hispanic female in the fetal position. CBP Officers assisted the woman in exiting the trunk area. The Hispanic woman subsequently asked the CBP Officers to help her sister, who was concealed behind the rear seat, in exiting the vehicle. The CBP Officers removed the rear bottom seat, unhooked the back rest cushion from the brackets and discovered a Hispanic female minor concealed in a non-factory rear seat compartment. The concealed females admitted being citizens of Mexico with no documents to enter or reside in the United States and are now identified as Material Witnesses (MW): **Maria Guadalupe GARCIA-Tolento (MW1) and L.G.G.T. (MW2)**.

During a videotaped proceeding, Defendant was advised of his Miranda Rights. Defendant acknowledged his rights and elected to answer questions without an attorney present. Defendant admitted he was approached by an unknown man with the opportunity to make money by smuggling undocumented aliens into the United States. Defendant admitted knowing there were two females concealed in the vehicle. Defendant admitted he was to drive the vehicle to the Texaco gas station on L Street and Broadway in Chula Vista, California. Defendant admitted he was to deliver the aliens, then drive the vehicle back into Mexico and receive \$350.00 (USD) for the smuggling act. Defendant admitted knowing alien smuggling is against the law.


**Continuation of Probable Cause Statement
United States vs. Jon Ralph Lara DIBBLE**

During a videotaped interview, MW1 and MW2 admitted being citizens of Mexico with no documents to enter or reside in the United States. MW1 and MW2 admitted each was to pay \$3,500.00 (USD) to be smuggled into the United States. MW1 and MW2 stated they were going to Santa Ana, California to seek employment and go to school.

EXECUTED ON THIS 16TH DAY OF AUGUST 2008 AT 2:00 PM.


Eric M. Velazquez / CBP Enforcement Officer

On the basis of the facts presented in the Probable Cause Statement consisting of (2) page(s), I find probable cause to believe that the defendant named therein committed the offense on August 15, 2008 in violation of Title 8, United States Code, Section 1324.


MAGISTRATE JUDGE

8/16/08 at 7:51 PM
DATE/TIME